

Marion T. Hack (SB #179216)  
marion.hack@troutman.com  
Luke Nicholas Eaton (SB #280387)  
Luke.eaton@troutman.com  
William Taylor (*admitted pro hac vice*)  
William.taylor@troutman.com  
**TROUTMAN PEPPER HAMILTON SANDERS LLP**  
350 South Grand Avenue, Suite 3400  
Los Angeles, CA 90071  
Telephone: 213.928.9800  
Facsimile: 213.928.9850

*Attorneys for  
AECOM Technical Services, Inc.*

Aaron R. Gruber (SB #209509)  
agruber@rallsgruber.com  
Dylan J. Crosby (SB #299536)  
dcrosby@rallsgruber.com  
Ralls Gruber & Niece LLP  
1700 S. El Camino Real, Suite 150  
Dan Mateo, CA 94402  
Telephone: 650.445.0543  
Facsimile: 650.240.2250

*Attorneys for  
Pacific Gas and Electric Company*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND**

JH KELLY, LLC

Plaintiff,

Case No. 4:20-cv-05381-HSG (Lead Case)

AECOM TECHNICAL SERVICES, INC. et al

(Reference withdrawn from Bankruptcy  
Case No. 19-30088, Adv. Proc. No. 20-  
03019 and Adv. Proc. No. 19-03008)

Defendant.

(Consolidated with Case No. 3:20-cv-08463-EMC)

**[PROPOSED] ORDER ON  
STIPULATED REQUEST TO  
MODIFY BRIEFING SCHEDULE  
ON PG&E'S AMENDED MOTION  
TO DISMISS/STRIKE RE: AECOM'S  
SECOND AMENDED COUNTER-  
CLAIM [DKT NO. 69]**

1 Pursuant to Civil L.R. 6-2, AECOM Technical Services (“AECOM”), and Pacific Gas and  
2 Electric Company (“PG&E”) (collectively, the “Parties”) jointly seek an order of the Court to  
3 modify the briefing schedule for PG&E’s Amended Motion to Dismiss/Strike re: AECOM’s  
4 Second Amended Counterclaim.

5 The Parties, through their respective counsel, stipulate as follows:

6 WHEREAS, on August 9, 2021, PG&E filed its Motion to Dismiss/Strike re: AECOM’s  
7 Second Amended Counterclaim [Dkt. No. 67], setting a hearing date of November 18, 2021;

8 WHEREAS, on August 17, 2021, PG&E filed its Amended Motion to Dismiss/Strike re:  
9 AECOM’s Second Amended Counterclaim [Dkt. No. 69], setting a hearing date of November 4,  
10 2021;

11 WHEREAS, per the Federal Rules of Civil Procedure, the last day for AECOM to file  
12 AECOM’s Response to PG&E’s Amended Motion to Dismiss/Strike re: AECOM’s Second  
13 Amended Counterclaim is August 31, 2021;

14 WHEREAS, per the Federal Rules of Civil Procedure, the last day for PG&E to file  
15 PG&E’s Reply to AECOM’s Response to PG&E’s Amended Motion to Dismiss/Strike re:  
16 AECOM’s Second Amended Counterclaim is September 7, 2021;

17 WHEREAS, the Parties wish to focus their time and resources on discovery and  
18 depositions in the coming months;

19 WHEREAS, there have been no previous time modifications in this case related to  
20 PG&E’s Amended Motion to Dismiss/Strike re: AECOM’s Second Amended Counterclaim, but  
21 there have been three (3) other brief time modifications in the case by stipulation of the Parties;

22 WHEREAS, the reason for requesting the enlargement of time related to PG&E’s  
23 Amended Motion to Dismiss/Strike re: AECOM’s Second Amended Counterclaim is so that the  
24 Parties may conserve resources and time to focus on key depositions of witnesses related to the  
25 Parties’ claims;

26 WHEREAS, the requested time modification will not impact the schedule for the case.

27 NOW THEREFORE, in consideration of the foregoing, the Parties, by and through their  
28 respective counsel, hereby STIPULATE and AGREE as follows:

[PROPOSED] ORDER ON STIPULATED REQUEST TO MODIFY BRIEFING SCHEDULE

1. AECOM's deadline to file its Response to PG&E's Amended Motion to Dismiss/Strike  
re: AECOM's Second Amended Counterclaim is continued from August 31, 2021 to September  
17, 2021;

2. PG&E's deadline to file its Reply to AECOM's Response to PG&E's Amended Motion to Dismiss is continued from September 7, 2021 to October 1, 2021;

3. The hearing date for PG&E's Amended Motion to Dismiss shall remain on November 4, 2021.

4. By entering into this Stipulation, the Parties do not waive, and expressly preserve any and all rights and defenses.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: \_\_\_\_\_, 2021

By: \_\_\_\_\_  
HAYWOOD S. GILLIAM, JR.  
United States District Judge